

OUTTEN & GOLDEN LLP

MEMO ENDORSED

Advocates for Workplace Fairness

December 11, 2013

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**VIA EMAIL**

The Honorable Richard J. Sullivan  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *Anwar v. Transportation Systems, Inc. d/b/a Executive Transportation Group, et al.*, No. 13 Civ. 2666 (RJS)

Dear Judge Sullivan:

We represent Plaintiffs in the above-referenced matter.

We write jointly with Defendants to respectfully request that the Court reconsider its November 27, 2013 denial of the parties' request for an extension of the deadline to mediate and allow them a brief extension from December 13, 2013 to January 7, 2014. The parties have confirmed with Vivian Shelanski, the mediator, that she is available on that date. The parties were not able to mediate sooner than January 7<sup>th</sup> because of Ms. Shelanski's schedule and because, until yesterday, they were still in the process of determining whether, based on the pre-mediation discovery and the recent denial of class certification in a similar case, *Saleem v. Corporate Transportation Group, Ltd.*, No. 12 Civ. 8450, 2013 WL 6061340 (S.D.N.Y. Nov. 15, 2013), mediation should go forward at all and if so, under what terms. The parties have now resolved those issues and are prepared to mediate and attempt to resolve the case. This is the parties' third request for an extension of the mediation deadline.

The parties will abide by the Court's order that they submit a proposed case management plan by December 20, 2013.

We thank the Court for its consideration of the parties' request.

Respectfully submitted,

  
Michael J. Scimone

CC: Eric J. Wallach, Esq. (via Email)  
Joseph A. Piesco, Jr., Esq. (via Email)  
Elisheva M. Hirshman, Esq. (via Email)  
Wayne Ian Baden, Esq. (via Email)

Adam T. Klein, Esq.  
Stephen H. Kahn, Esq.  
Olivia J. Quinto

The parties' request to adjourn the deadline for mediation to January 7, 2014 is GRANTED. The parties shall continue to comply with the Court's Orders -- including those dated August 26, 2013, October 10, 2013, and November 27, 2013 -- to submit a joint letter and proposed case management plan by December 20, 2013 and appear for an initial conference on January 8, 2014 at 1:00 p.m.

SO ORDERED  
Dated: 12/11/13  
R. Sullivan  
U.S.D.J.